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Sent: 8/15/2019 9:28:05 PM
To: Gray, David [gray.david@epa.gov]
Subject: Denka Performance Elastomer (DPE) Response to UNHR Report
Attachments: UNHR Report - Critique August 12 2019.pdf; Sandra Sulsky CV copy.pdf

Hello David,

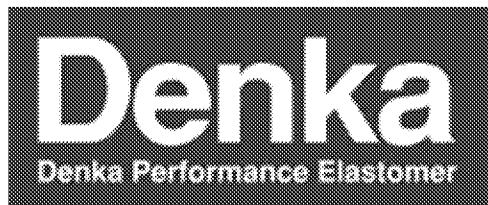
I hope all is well with you. I'm writing you this note to keep you informed about the latest aspect of Denka's commitment to ensuring the best science is always applied to studies and assertions made about chloroprene.

You may be aware that a group called the University Network for Human Rights (UNHR) released a "study" last month in which they claim to have uncovered a high rate of cancer among the residents in the area surrounding our plant. The report received some local press and a short piece on CBS Evening News. In response, we commissioned an objective scientific review of the UNHR report on cancer in St. John the Baptist Parish published last month. Please find that review **attached** and some of its key points extracted below. The author of the report, Dr. Sandra Sulsky, is an experienced epidemiologist and principal of Ramboll US Corporation, part of a multinational environmental consulting group. Her CV is attached.

- The UNHR report does not list any authors and was not subject to peer review or any other type of objective review.
- The report methodologies are insufficiently described and therefore cannot be thoroughly examined or recreated.
- Geographical areas studied were arbitrary and not based on measured chloroprene exposure, meaning report's health results can't be compared with exposure levels.
- The report's methods were not designed to prevent biases, which for example could have increased the likelihood of selection of unhealthy survey participants and could inflate the frequency of illness reported.
- Self-reported cancers and other health outcomes were not objectively verified, making it impossible to verify results based on them.
- Potential confounders of risk such as lifestyle choices, diet, gender, race, age, family history, etc. were not accounted for in the report.
- The report's results directly contradict the historical and current findings of the Louisiana Tumor Registry. The Tumor Registry's findings are based on verified cancer diagnoses, which are inherently more reliable and accurate than self-reported cases and cases reported on others' behalf.
- The UNHR Report does not reveal the different types of cancer diagnoses being reported by the respondents. The study asked for non-specific health impacts and cancers, which means the reported illnesses could be caused by a multitude of factors, and could not be separated for analysis from those thought to be linked to chloroprene. No single chemical is related to all cancers or illnesses reported.
- The authors of the report compared cancer prevalence as reported by survey respondents to expected cancer prevalence rates that the authors estimated using a statistical approach. The authors applied this approach incorrectly, making the comparison between the reported prevalence rate and the erroneous estimated expected cancer rate meaningless.

We have sent this to LDEQ, as well as the Louisiana Department of Health and Hospitals, for use in their messaging if they choose, or just to have handy talking points for reference. Please feel free to do the same. And if you have any questions, you can reach out to me.

Jorge



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